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Case No.

AO 91 (Rev. 11/11) Criminal Complaint Task Force Officer: Kylie Churches (ATF) Telephone: (313) 202-3400

# UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America	
v.	
CORTAZE RAYSHARD KEG	LAR-JOHNSON

Case: 2:22-mj-30492 Assigned To: Unassigned

Assign. Date: 11/10/2022 Description: COMP USA V. KEGLAR–JOHNSON (KB

#### **CRIMINAL COMPLAINT**

On or about the date(s) of		No	vember 9, 2022	in the county of	Wayne	_ in the
Eastern	District of	Michigan	, the defendant	(s) violated:		
Code Section		Offense Description				
18 U.S.C. § 922(g)(1)		Felon in Possession	of a Firearm			
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SEE ATTACHED	minal complaint is b AFFIDAVIT	based on these	e facts:			
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Continued on the attached sheet.		l.		Kylis Ch Complaind	urches	
				Complaine	ant's signature	
			Task Force Officer Printed name	Kylie Churches, AT	F	
Sworn to before me and signed in my presence		nce		Frintea name	ana iiile	
and/or by reliable e	lectronic means.			K: M	ADL	
Date: November	er 10, 2022			Judge's sign	nature	
City and state: Detroit, Michigan				Hon. Kimberly G. Altman,		· A
			Printed name		ς.υ	

## AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Task Force Officer Kylie Churches, being first duly sworn, hereby depose and state as follows:

#### I. INTRODUCTION

- 1. I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under federal law.
- 2. I have been a Task Force Officer with ATF since March 2022. Prior to becoming a Task Force Officer with the ATF, I was a police officer with the city of Detroit for approximately three years. I received extensive law enforcement training through the Detroit Police Department Training Center. I also have a bachelor's degree in criminal justice.
- 3. As an ATF Task Force Officer, I have authored numerous state search warrants, state criminal complaints, and state arrest warrants.
- 4. As an ATF Task Force Officer, I have participated in numerous criminal investigations, including, but not limited to, investigations involving firearms, armed drug trafficking, and criminal street gangs. I am familiar with, and have experience using, a variety of investigative techniques and resources.

Through these investigations, my training and experience, and conversations with other agents and other law enforcement personnel, I have become familiar with federal firearms violations.

- 5. The statements contained in this affidavit are based, in part, on my review of written police reports by members of the Detroit Police Department. This affidavit also includes information provided to me by and/or through other law enforcement agents, investigators, other individuals with knowledge of this matter, my investigation, and the review of documents.
- 6. I have not included each and every fact known to me concerning this investigation; rather I have set forth only the facts necessary to establish probable cause that Cortaze Rayshard KEGLAR-JOHNSON (DOB: XX/XX/1993) violated 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm.

#### II. PROBABLE CAUSE

7. I reviewed KEGLAR-JOHNSON's criminal history which includes the following 2017 conviction out of the Third Judicial Circuit Court, Wayne County: Felony Delivery/Manufacturing a Controlled Substance Less than 50 grams. Based on his conviction, KEGLAR-JOHNSON is prohibited under federal law from possessing firearms.

- 8. On July 5, 2022, at approximately 8:05 p.m., Detroit Police officers were dispatched to Balfour and Yorkshire for a "felonious assault domestic violence" police run. Once officers arrived, they spoke to the victim, Adult Victim-1 (AV-1).
- 9. AV-1 reported that she was traveling in her vehicle with her children when KEGLAR-JOHNSON, her children's father, began following her. KEGLAR-JOHNSON was a passenger in a dark blue Chevrolet Impala. While in the car, KEGLAR-JOHNSON hung out of the passenger window, waved a silver and black handgun, and began yelling. At one point, KEGLAR-JOHNSON pointed the firearm at AV-1 and said, "bitch I'll shoot you in the face!" AV-1 described the firearm as a black and silver handgun.
- 10. That same day, at approximately 9:24 p.m., AV-1 called 911 to report KEGLAR-JOHNSON "flashing his gun" while riding up and down her street. Detroit Police Officers responded to the location. Upon their arrival, officers spoke to AV-1, who advised that KEGLAR-JOHNSON had been following her for hours. AV-1 stated KEGLAR-JOHNSON produced a black and silver pistol and was in a black Chevrolet Impala.
- 11. In furtherance of the investigation, Detroit Police Task Force Officer (TFO) Ali Bilal reviewed other Detroit Police Reports that involved KEGLAR-JOHNSON in possession of firearms. TFO Bilal found at least five additional

occasions between 2017 and 2021 where KEGLAR-JOHNSON possessed a firearm. In one of the reported incidents, KEGLAR-JOHNSON pointed a rifle at AV-1.

- 12. In July of 2022, TOF Bilal located numerous pictures of KEGLAR-JOHNSON, on social media, in possession of firearms. Some of the posts dated back to early 2022. He possessed rifles and handguns in various pictures. In a January 7, 2022, post, KEGLAR-JOHNSON had a handgun in each hand and two handguns in his lap. Based on the above information, TFO Bilal obtained a state search warrant for KEGLAR-JOHNSON's residence on McKinney Street, Detroit, Michigan.
- 13. On July 21, 2022, at approximately 10:15 a.m., TFO Bilal executed a search warrant at KEGLAR-JOHNSON's residence. After the scene was secured, officers seized nine different firearms from the residence.
- 14. Following the execution of the July 21 search warrant, TFO Bilal continued to watch KEGLAR-JOHNSON's social media posts. TFO Bilal discovered that, on September 3, 2022, four photographs were uploaded that depicted KEGLAR-JOHNSON holding what appeared to be a firearm. KEGLAR-JOHNSON was standing on top of a black Tahoe and appeared to be next to his McKinney Street residence.

- 15. On October 24, 2022, at approximately 1:10 p.m., TFO Bilal conducted surveillance at the McKinney Street location. KEGLAR-JOHNSON was observed driving a black 2007 Chevrolet Tahoe. Later, KEGLAR-JOHNSON entered a white truck with a female passenger. They drove away from the location. TFO Bilal followed the vehicle to a residence on University Place.
- 16. Additional investigative work revealed police reports that placed KEGLAR-JOHNSON at the University Place residence. A law enforcement databased listed KEGLAR-JOHNSON as a registered person at the University Place residence. Surveillance put a black Tahoe at the residence.
- 17. On October 26, 2022, KEGLAR-JOHNSON was observed standing near the black Tahoe at the University Place residence.
- 18. On November 8, 2022, the black Tahoe driven by KEGLAR-JOHNSON was parked in the driveway of the University Place residence.
- 19. Historically, on April 9, 2022, Detroit Police officers responded to a domestic violence run at the University Place residence. Adult Victim-2 (AV-2) reported that KEGLAR-JOHNSON slapped her in the face and took her iPhone before leaving the residence. On July 8, 2022, Detroit Police officers responded to the University Place residence for a domestic violence call. AV-2 was outside of the home naked and screaming at KEGLAR-JOHNSON. KEGLAR-JOHNSON

fled the scene in a vehicle. AV-2 reported that she lived with KEGLAR-JOHNSON.

- 20. TFO Bilal conducted a LEIN inquiry into KEGLAR-JOHNSON and discovered he had an active warrant for Receiving and Concealing Stolen Property as of November 3, 2022.
- 21. Based on the above information, TFO Bilal obtained a state search warrant for the University Place residence.
- 22. On November 9, 2022, ATF agents and Detroit Police Department (DPD) Task Force Officers executed the University Place search warrant. Four individuals, including KEGLAR-JOHNSON, were present at the location.
  - 23. During the search, law enforcement seized the following items:
    - a. One Ruger model: LCP, 380 Auto with a Viridian laser attached, found in the top left dresser drawer in the Northeast bedroom;
    - b. One 5.56 live round on top of the bed in the Northeast bedroom;
    - c. One iPhone recovered on top of the dresser in the Northeast bedroom;

- d. Documentation in the name of KEGLAR-JOHNSON in the top left dresser drawer and on top of the dresser where the firearm was recovered in the Northeast bedroom; and
- e. One 5.56 live round inside a cabinet on the Northeast side of the garage.
- 24. After receiving *Miranda* warnings, the three other people found in the residence agreed to speak with agents and were questioned regarding the presence of firearms. All three denied any knowledge or possession of any firearms located inside the residence.
- 25. AV-2 was present during the execution of the search warrant. AV-2 indicated that she rented the University Place residence. AV-2 indicated that she had two kids with KEGLAR-JOHNSON and she was currently pregnant with his child. AV-2 also said that she stayed in the Northeast bedroom with KEGLAR-JOHNSON. The other two individuals in the KEGLAR-JOHNSON home indicated that they did not live at the University Place residence and were there to spend time with AV-2.
- 26. Inside the residence were two bedrooms located on the main floor.

  One of the bedrooms appeared to be used for children. The other bedroom was the Northeast bedroom where the firearm was found. There was a room upstairs in the residence, but it was vacant.

- 27. A search in a law enforcement database revealed that the recovered Ruger Model: LCP .380 caliber firearm was not registered in the State of Michigan.
- 28. ATF Special Agent McLean, a Firearms Interstate Nexus Expert, was advised of the recovered Ruger model: LCP .380 caliber firearm. Based on his training and experience, S/A McLean opined, based on the physical characteristics of the firearm and physically examining the Ruger model: LCP, .380 caliber semi-automatic handgun, that the firearm meets the federal definition of a firearm and that it was manufactured outside the State of Michigan and therefore traveled in interstate and/or foreign commerce.
- 29. KEGLAR-JOHNSON was placed under arrest for his open warrant and transported to the Detroit Detention Center (DDC). Before arriving at the DDC, KEGLAR-JOHNSON stated, "every time an officer approaches me, I'm gonna blow their shit out."

### III. CONCLUSION

30. Probable cause exists that, on November 9, 2022, while in the Eastern District of Michigan, KEGLAR-JOHNSON, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, possessed a Ruger model LCP, .380 caliber, semi-automatic pistol in violation of 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm.

Task Force Officer Kylie Churches
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. Kimberly G. Altman United States Magistrate Judge

Dated: November 10, 2022